

Atty. Docket No. YOR920010072US1
(590.044)

REMARKS

Applicant and the undersigned are most grateful for the time and effort accorded the instant application by the Examiner. The Office is respectfully requested to reconsider the rejections presented in the outstanding Office Action in light of the following remarks.

Claims 1 - 25 were pending in the instant application at the time of the outstanding Office Action. Of these claims, Claims 1, 13, and 25 are independent claims; the remaining claims are dependent claims. All claims stand rejected by 35 U.S.C. § 103(a) over Nouza in view of Eide et al. (hereafter "Eide") and further in view of De Souza et al. (hereinafter De Souza). The Action takes the position that De Souza recites "[r]ebuilding the model for each of a pre-selected number N of the ranked features". (Page 3). Reconsideration and withdrawal of the present rejections are hereby respectfully requested.

As presently amended, Claims 1 and 25 recite **rebuilding the model** for each of a preselected number N of the ranked linguistic features. (emphasis added) Similar language appears in Claim 13. As set forth in the specification, "at 105, models are rebuilt for those N features in a manner such as that described here below in connection with Figure 2. The models from 101 and 105 differ in the second stage of the build where the input features are 26-dimensional (13 original +13 discriminative) and 17-dimensional (13 original + 4 discriminative.)" (Page 9, lines 14-17) As discussed in connection with Figure 2, feature generation in the present invention is an iterative

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process, which is simply not taught or suggested by the applied references. As asserted in the Action dated February 15, 2005, "[n]either Nouza nor Eide explicitly teach the additional step of rebuilding the model for each of a preselected number of ranked features". (Page 3) It is respectfully submitted that De Souza also does not explicitly teach the additional step of rebuilding the model for each of a preselected number of ranked linguistic features.

As best understood, De Souza appears to generate tone-sensitive acoustic models using fenones to represent the phonemes that are used as models in speech recognition. (Column 4, lines 9-33) These fenonic models are created using the phonetic alignment of the input speech data. Specifically, each arc in the original phonetic sequence of the phonetic model of speech is replaced by the fenone that maximizes the joint likelihood that all of the feature vectors that are aligned with each particular phonetic arc in the speech samples. (Column 16, lines 15-49)

As is evident, De Souza builds two models, a phonetic model and a fenonic model of the input speech data. De Souza does not rebuild either the phonetic model or the fenonic model. Additionally, the second model (the fenonic model) that is built is not built for each of the ranked linguistic features. Rather, it is built for each of the distinct arcs in the phonetic sequence of the speech model, based on the Markov model of the speech rather than on the linguistic features of the speech.

In view of the foregoing, it is respectfully submitted that Claims 1, 13, and 25 fully distinguish over the applied art and are thus allowable. By virtue of dependence

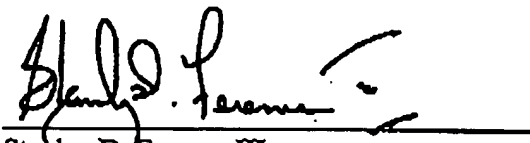
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from what is believed to be allowable independent Claims 1, 13, and 25, is respectfully submitted that Claims 2-12 and 14-24 are also presently allowable.

The "prior art made of record" has been reviewed. Applicant acknowledges that such prior art was not deemed by the Office to be sufficiently relevant as to have been applied against the claims of the instant application. To the extent that the Office may apply such prior art against the claims in the future, Applicant will be fully prepared to respond thereto.

In summary, it is respectfully submitted that the instant application, including Claims 1-25, is in condition for allowance. Notice to the effect is hereby earnestly solicited. If there are any further issues in this application, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,



Stanley D. Ference III
Registration No. 33,879

Customer No. 35195
FERENCE & ASSOCIATES
409 Broad Street
Pittsburgh, Pennsylvania 15143
(412) 741-8400
(412) 741-9292 - Facsimile

Attorney for Applicants